

April 28, 2025

**VIA ECF**

The Honorable Matthew F. Kennelly, U.S.D.J.  
United States District Court for the Northern District of Illinois  
Everett McKinley Dirksen U.S. Courthouse  
Chicago, Illinois 60604

**RE: *In re MultiPlan Health Insurance Provider Litig.*, No. 1:24-cv-06795 (N.D. Ill.)**

Dear Judge Kennelly,

Counsel for the Class and DAPs have coordinated and are prepared to present oral argument at the May 2, 2025 motion to dismiss hearing. In anticipation of this Court's questions, Plaintiffs have divided up their argument in the following manner:

1. Natasha Fernández-Silber will address circumstantial evidence of the alleged cartel and relevant market definition.
2. Stephen Medlock will address direct evidence of the alleged cartel and the Direct Action Plaintiffs' hub-and-spoke, vertical restraint, and information exchange counts.
3. Jennifer Scullion will address antitrust standing, antitrust injury, and the Direct Action Plaintiffs' state law claims.

Plaintiffs intend to present their arguments in that order but are happy to adjust to suit the Court's preferences during oral argument.

Respectfully submitted,

/s/ Christopher A. Seeger  
Christopher A. Seeger  
SEEGER WEISS LLP  
*Plaintiffs' Coordinating Counsel*

/s/ Shawn J. Rabin  
Shawn J. Rabin  
SUSMAN GODFREY LLP  
*Interim Class Liaison Counsel*

ECF: Counsel of Record